

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

TALUT I. FURQAN,
[DOB: 08/21/1987],

Defendant.

Case No. 24-CR-00145-01-CR-W-HFS

COUNTS ONE & TWO:

(Making a False Statement on ATF Form 4473)

18 U.S.C. §§ 922(a)(6) and 924(a)(2)

NMT: 10 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

\$100 Mandatory Special Assessment

Class C Felony

\$100 Mandatory Special Assessment for
Each Count

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Making a False Statement on ATF Form 4473)

On or about February 12, 2021, in the Western District of Missouri, the defendant, TALUT I. FURQAN, in connection with the acquisition and attempted acquisition of the firearms listed below for the specific count (“firearms”), from a dealer listed below for the specific count (“FFL #1), a licensed dealer of firearms within the meaning of Chapter 44 Title 18, United States Code, knowingly made a false and fictitious written statement to the dealer, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sales and acquisition of the firearms to the defendant under chapter 44 of Title 18, United States Code, in that the defendant falsely represented on a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473 that in response to Question 21.a, that the defendant was the actual transferee/buyer of each firearm listed on each form and these statements and representations by the defendant were completely false, as the defendant well knew.

<u>Count</u>	<u>Date</u>	<u>Dealer</u>	<u>Firearms</u>
1	2/12/2021	FFL #1, Independence, Missouri	Sig Sauer, model P229, 9mm pistol bearing serial number AM68145
1	2/12/2021	FFL #1, Independence, Missouri	Springfield Armory, model XDME, 9mm pistol bearing serial number BY263210
1	2/12/2021	FFL #1, Independence, Missouri	Hi-Point Firearms, model JCP, .40 caliber pistol bearing serial number 700055
1	2/12/2021	FFL #1, Independence, Missouri	SCCY Industries, model CPX-2, 9mm pistol bearing serial number C084688
1	2/12/2021	FFL #1, Independence, Missouri	Beretta, model Centurion APX, 9mm pistol bearing serial number A120137X
1	2/12/2021	FFL #1, Independence, Missouri	Beretta, model Centurion APX, 9mm pistol bearing serial number A121397X
1	2/12/2021	FFL #1, Independence, Missouri	Beretta, model Centurion APX, 9mm pistol bearing serial number A121398X
1	2/12/2021	FFL #1, Independence, Missouri	Beretta, model APX, 9mm pistol bearing serial number AXC040399
1	2/12/2021	FFL #1, Independence, Missouri	Beretta, model APX, 9mm pistol bearing serial number AXC040400
1	2/12/2021	FFL #1, Independence, Missouri	Beretta, model APX, 9mm pistol bearing serial number AXC040432
1	2/12/2021	FFL #1, Independence, Missouri	Beretta, model APX, 9mm pistol bearing serial number AXC040440
1	2/12/2021	FFL #1, Independence, Missouri	Beretta, model APX, 9mm pistol bearing serial number AXC040441

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWO

(Making a False Statement on ATF Form 4473)

On or about February 18, 2021, in the Western District of Missouri, the defendant, TALUT I. FURQAN, in connection with the acquisition and attempted acquisition of the firearms listed below for the specific count (“firearms”), from a dealer listed below for the specific count (“FFL #1”), a licensed dealer of firearms within the meaning of Chapter 44 Title 18, United States Code, knowingly made a false and fictitious written statement to the dealer, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sales and acquisition of the firearms to the defendant under chapter 44 of Title 18, United States Code, in

that the defendant falsely represented on a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473 that in response to Question 21.a, that the defendant was the actual transferee/buyer of each firearm listed on each form and these statements and representations by the defendant were completely false, as the defendant well knew.

<u>Count</u>	<u>Date</u>	<u>Dealer</u>	<u>Firearms</u>
2	2/18/2021	FFL #1, Independence, Missouri	Glock, model 45, Gen 5, 9mm pistol bearing serial number BPDH458

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

A TRUE BILL.

7/16/2024
DATE

/s/Emily Schrader
FOREPERSON OF THE GRAND JURY

/s/David A. Barnes
David A. Barnes
Assistant United States Attorney
Violent Crime & Drug Trafficking Unit
Western District of Missouri